

CLEARANCE PROCEDURES FOR SCIENTIFIC AND TECHNICAL DOCUMENTS

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I. PURPOSE

This Guide establishes procedures for ensuring that scientific and technical documents emanating from the Centers for Disease Control and Prevention (CDC),¹ regardless of the method of publication, are scientifically and technically accurate and do not contain policy statements inconsistent with CDC policy. The Guide both describes the general responsibilities for clearance of documents within the Centers, Institute, and Offices (CIOs) of CDC and provides guidance on cross-clearance, dispute resolution, final clearance, and filing and retention of scientific and technical documents.

II. SCOPE

This Guide applies to the review and clearance of all scientific and technical documents that are a) intended for publication by CDC or b) authored or coauthored by CDC staff and intended for publication by an organization (e.g., the *Journal of the American Medical Association* or the World Health Organization) other than CDC. It applies to documents developed in conjunction with cooperative agreements, contracts, and other partnerships as well as abstracts intended for publication in proceedings of meetings.² This Guide does not apply to products resulting from associations with professional organizations external to CDC. Staff engaged in activities of professional committees as representatives of CDC CIOs should follow their CIO policies for clearance of committee products.

III. DEFINITIONS

- A. Author.³ *Author* refers to either the first CDC-affiliated person named on the authorship line or to the person who has primary responsibility for the document. When reporting on work conducted

¹References to CDC also apply to ATSDR.

²Some CIOs require that oral presentations go through the clearance process. Please refer to individual CIO clearance procedures for more information.

³For additional guidance on authorship, see Manual Guide—General Administration No. CDC-69, Authorship of CDC or ATSDR Publications.

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while affiliated with CDC, former CDC personnel are considered CDC authors for clearance purposes. For current CDC personnel, investigations or thesis work done before joining CDC are not considered to be work done while affiliated with CDC unless substantial time is devoted to completing this work after joining CDC.

- B. Coauthor. *Coauthor* refers to all other CDC-affiliated authors. When reporting on work conducted while affiliated with CDC, former CDC personnel are considered CDC authors for clearance purposes. For current CDC personnel, investigations or thesis work done before joining CDC are not considered to be work done while affiliated with CDC unless substantial time is devoted to completing this work after joining CDC.
- C. Document. A *document* refers to text (including any tables and illustrations) that will be submitted for publication, including but not limited to a manuscript, article, book or book chapter, periodical, report, written abstract, fact sheet, pamphlet, brochure, audiotape or videotape script, or training materials.
- D. Publication. *Publication* refers to distribution of document in either print or electronic media (e.g., fax, diskette, CD ROM, Intranet, or Internet).

IV. RESPONSIBILITIES AND PROCEDURES

A. General Responsibilities for Clearance Within CIOs

CIO Directors are responsible to the Director, CDC, for the scientific and technical accuracy and policy implications of all scientific and technical documents originating in their CIO, regardless of the method of publication.

CIO Directors are responsible for providing written procedures and guidelines for the CIO components to follow for document clearance. The clearance process should be timely, consistently followed, and should ensure that:

- The document contains information that is correct and worthy of publication;
- The document does not advocate policies that are inconsistent with existing policies of CDC, the U.S. Public Health Service, or the Department of Health and Human Services. However, the document may contain information that would support the development of new or revised policies. For documents that either formulate or advocate for new or revised policies or otherwise pose policy

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concerns, CIO Directors should request policy clearance from the Office of the Director, CDC (i.e., the Associate Director for Science);

- The document does not include information that might infringe on the privacy of, or reflect unfairly on, any person, institution, or agency;
- Written permission to use copyrighted material is obtained;
- Proper methods and procedures were followed, described, and referenced correctly;
- Conclusions are valid and supported by reference to facts;
- Appropriate authors and coauthors are included and have signified, by memorandum or initials on the clearance form, that they approve the content of the document and that they are properly identified;
- Permission is obtained from those listed in the acknowledgment section;
- Authors are notified of the reason for delay if review and clearance is being delayed beyond four weeks;
- Written explanation is given to authors when clearance is denied;
- Documents that have been cleared for publication in one medium (e.g., the Internet) do not require clearance for publication in another medium (e.g., a brochure.)

B. Cross-Clearance

The purpose of cross-clearance is to ensure that policy implications and scientific quality have been reviewed and approved by all CIOs whose staff are coauthors of a document. In addition, a CIO Director (or designee) should request cross-clearance of any document that has a policy statement (or implied policy statement) relevant to the mission of another CIO or that comments directly on the programs of another CIO. The purpose of cross-clearance is to ensure that such policy statements do not conflict with the policies of another CIO. It is the responsibility of the Director (or designee) of the clearing author to initiate appropriate cross-clearance(s) for policy statements for a specific document and to indicate that as the reason for cross-clearance.

In the circumstance when a CIO utilizes data collected and maintained by another CIO, the second CIO must be offered the opportunity to

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participate in reviewing drafts and being included in the clearance process.

Additional cross-clearances may also be required by the Office of the Director in cases in which the subject matter of a document is considered sensitive.

For documents that result from a study, the responsibility for initiating clearance lies with the CIO that has or had supervisory responsibility for the clearing author when the study was conducted. If this CIO is not the clearing author's current CIO, then cross-clearance needs to include the clearing author's current CIO. If the clearing author was assigned to temporary duty status (TDY) while conducting the study, the clearing author's supervisor during the TDY should be included in the cross-clearance process.

Each CIO should clearly designate a staff member to be responsible for processing cross-clearances. Cross-clearances should be processed quickly, with a response (i.e., approval or disapproval with justification) delivered to the initiating CIO within four weeks after receipt. If cross-clearance is delayed, the initiating CIO may notify the cross-clearing CIO that publication will proceed without cross-clearance unless the cross-clearing CIO has notified the initiating CIO and provided adequate justification for the delay.

C. Dispute Resolution on Clearance Issues

Ongoing communication among authors, coauthors, and supervisors throughout the process of preparing material for publication will help prevent disputes from arising during the clearance process. However, occasional disputes concerning scientific/technical, policy, and editorial areas may arise during the clearance process. Thus, each CIO should establish procedures for dealing with disputes that arise within that CIO.

In resolving disputes, the guiding principle is that resolution of conflict should occur at the lowest possible level of the organization. When resolution is difficult to achieve, the disputants and their supervisors should consider using the alternative dispute resolution process. The following steps are provided as guidelines for establishing procedures for dealing with disputes:

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6. For Disputes Within or Among CIOs

The disputants should try to resolve the conflict among themselves. If the conflict persists, they should proceed to resolution through their respective supervisory channels. If a satisfactory solution is not achieved, the disputants may meet with their respective Assistant or Associate Directors for Science (or other person designated by the CIO Director) to arrive at resolution. If all else fails, the disputant(s) and/or supervisors and/or Assistant or Associate Directors for Science (or other person designated by the CIO Director) may go to the Associate Director for Science, CDC, for final resolution.

2. For Disputes Among CDC and External Collaborators

The disputants should try to resolve the conflict among themselves. If a satisfactory solution is not achieved, then the disputants may ask their supervisors and/or Assistant or Associate Directors for Science or equivalent and/or the Associate Director for Science, CDC, to mediate.

D. Final Clearance

The Director (or designee) of the clearing author's CIO is responsible for final approval or rejection of a document on behalf of CDC, except in cases in which the Office of the Director, CDC, has been asked to give final approval. All CIOs with the exception of the National Center for Health Statistics (NCHS) will record this action on clearance form CDC.0576, Publication/Presentation Clearance. NCHS will use NCHS Publication Form 1, NCHS Manuscript Clearance Form, for this purpose.

When approval/disapproval has been signified on the appropriate clearance form by all of the appropriate CIO staff and by all concerned CIOs, the clearing author should be notified, and the document and a copy of clearance form CDC 0.576 or NCHS Publications Form 1 should be sent to the clearing author. The clearing author is responsible for obtaining the concurrence of coauthors in any substantive modifications in the document that occur as a result of the review and clearance procedure.

Documents that bear the name of CDC as the publisher or in which CDC has a proprietary interest and are intended for external distribution must be cleared through the Office of Communications, CDC, by using

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form HHS 615, Publication Planning and Clearance Request.⁴ Similarly, exhibits and audio and video products intended for external distribution must be cleared through the Office of Communications, CDC, by using form HHS 524A, Audiovisual Clearance Request.⁵

For newsworthy documents, an information copy of the abstract or a summary paragraph and the completed clearance form should be sent, as hard copy or electronic file, to the Office of Communications, CDC.

V. FILING AND RETENTION OF SCIENTIFIC AND TECHNICAL DOCUMENTS

A. Filing

Each CIO is responsible for ensuring that a record copy of all material developed, regardless of whether it is approved or published, is maintained for historical and research purposes. An organizational component within each CIO (i.e., an office of record) should be identified and given the responsibility for receipt, filing, and disposition of the record copy. A copy of the document and supporting material (i.e., clearance forms, substantive drafts,⁶ comments, correspondence, and electronic mail messages) can be maintained in the office of the clearing author in which the document was created. It is recommended that an office, rather than an individual, maintain supporting materials to prevent removal upon departure of the individual.

B. Retention

Scientific and technical documents should be retained in accordance with the CDC Records Control Schedule, B-321 Item 2-33, which requires that a record copy be maintained permanently. The record copy must be held in the office of record a minimum of five years after which it may be transferred to a Federal Records Center (FRC). When the material is 20 years old, it must be transferred to the National Archives for permanent historical retention. Supporting material must be held at CDC a minimum of two years after which it may be transferred to a FRC. When supporting material is 10 years

⁴For additional guidance on this type of clearance, see Manual Guide—Public Affairs Management No. CDC-2, CDC Publications.

⁵For additional guidance on this type of clearance, see Manual Guide—Public Affairs Management No. CDC-3, Audiovisuals (Excluding Exhibits) and Manual Guide—Public Affairs Management No. CDC-4, Exhibits.

⁶Substantive drafts are drafts that are not editorial in nature and contain information regarding a policy or procedure or contain other important information.

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old, it should be destroyed. Other material (e.g., drafts that are purely editorial in nature) and transitory correspondence (e.g., correspondence that has limited value such as those used to change a meeting date or transmit another draft of the document) can be disposed of upon the completion of the final document.